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March 6, 2008

BY FACSIMILE & ECF

Hon. Shira A. Scheindlin  
 United States District Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, N.Y. 10007

Re: United States v. John Melicharek  
 Client: Michel Iuni  
 07 Cr. 907 (SAS)

Dear Judge Scheindlin:

Please accept this letter as a request to modify the conditions of release for Michael Iuni so as to facilitate his meeting with his accountant for the purpose of preparing his 2007 Income Tax Returns for filing.

On October 23, 2007 following hearing the court granted bail to Michael Iuni with conditions of release which included the following: \$1,000,000.00 PRB secured by parents home and signed by defendant's parents, brother and sister; home detention with electronic monitoring; defendant to reside with his parents at his parent's home ; voluntary out-patient drug treatment; defendant to travel to drug treatment program only."

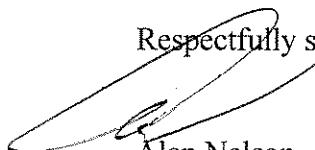
His conditions of release were subsequently modified to facilitate Mr. Iuni attending employment as an iron worker 5 days per week at specified job sites in the New York City metropolitan area. The defendant has been fully compliant with all conditions of release

Mr. Iuni wishes to meet with his accountants, Tax On Time, Inc., located at 1902 Bergeline Avenue, Union City, N.J. on March 15, 2008 at 3:00 P.M.

It is proposed that Mr. Iuni's electronic monitoring be turned off between 1:30-6:30 P.M. to permit him to visit with his accountant. This would allow the defendant 90 minutes travel time in each direction from Mahopac, N.Y. to Union City , N.J. and two hours for meeting with his accountant.

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It is respectfully requested that Mr. Juni's conditions of release be modified to permit him to leave his residence to attend to the preparation of his 2007 Income Tax Returns. I have spoken with AUSA Elie Honig and Pre-trial Officer Scott Kowal and both consent to this modification.

Respectfully submitted,  
  
Alan Nelson

cc: AUSA Elie Honig (ECF)